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29 *Attorneys for Defendant: Otto Trucking LLC*

30 **UNITED STATES DISTRICT COURT**
31 **NORTHERN DISTRICT OF CALIFORNIA**
32 **SAN FRANCISCO DIVISION**

33 Waymo LLC,

34 Case No. 3:17-cv-00939-WHA

35 Plaintiff,

36 **DECLARATION OF HONG-AN VU IN**
37 **SUPPORT OF DEFENDANT OTTO**
38 **TRUCKING'S ADMINISTRATIVE**
39 **MOTION TO FILE UNDER SEAL**
40 **PORTIONS OF ITS OPPOSITION TO**
41 **WAYMO LLC'S MOTION FOR ORDER**
42 **TO SHOW CAUSE (DKT. 847)**

43 v.

44 Uber Technologies, Inc.; Ottomotto LLC; Otto
45 Trucking LLC,

46 Defendants.

47 Courtroom: 8, 19th Floor
48 Judge: Honorable William Alsup
49 Trial Date: October 10, 2017

50 Filed/Lodged Concurrently with:

- 51 1. Admin. Mtn. to File Documents Under Seal
- 52 2. [Proposed] Order
- 53 3. Redacted/Unredacted Versions
- 54 4. Proof of Service

1 I, Hong-An Vu, declare as follows:

2 1. I am counsel at the law firm of Goodwin Procter LLP, counsel of record for
 3 Defendant Otto Trucking LLC (“Otto Trucking”). I make this declaration based upon matters
 4 within my own personal knowledge and if called as a witness, I could and would competently
 5 testify to the matters set forth herein. I make this declaration in support of Defendant Otto
 6 Trucking’s Administrative Motion to File Under Seal Portions of its Opposition to Plaintiff
 7 Waymo LLC’s Motion for Order to Show Cause (Dkt. 847) (“Opposition”).

8 2. I have reviewed the following documents and confirmed that only the portions
 9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Opposition	Highlighted Portions

10
 11 3. The highlighted portions of the Opposition contain highly confidential, sensitive
 12 business information of Otto Trucking relating to terms of Otto Trucking’s agreements, corporate
 13 structure, and financial information, and may contain such highly confidential and sensitive
 14 information relating to terms of Uber agreements. This highly confidential information is not
 15 publicly known, and its confidentiality is strictly maintained. I understand that if this information
 16 were made public, Otto Trucking’s competitors and counterparties would have insight into how
 17 Otto Trucking structures its business agreements, allowing them to modify their own business
 18 strategy. Otto Trucking’s competitive standing could be significantly harmed.

19 4. Otto Trucking’s request to seal is narrowly tailored to those portions of the
 20 motion’s supporting documents that merit sealing.

21
 22 I declare under penalty of perjury under the laws of the United States that the foregoing is
 23 true and correct. Executed this 24th day of July, 2017 in Los Angeles, California.

24
 25
 26 /s/ Hong-An Vu
 27
 28 HONG-AN VU